UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 05 2019

CERTIFIED MAIL 7017 2400 0000 7816 9868
RETURN RECEIPT REQUESTED

Mr. Rich Stutzki
Environmental Health and Safety Manager
3M Company
22614 Route 84N
Cordova, Illinois 61242

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 054 236 443

Dear Mr. Stutzki:

On March 5-9, 2018, representatives of the U.S. Environmental Protection Agency inspected the 3M Company (3M) located in Cordova, Illinois. As a large quantity generator of hazardous waste, 3M is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate 3M's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by 3M, EPA's review of records pertaining to 3M, and the inspector's observations, EPA has determined that 3M has unlawfully stored hazardous waste without a permit or interim status as a result of 3M's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c). EPA has identified the permit exemption conditions with which 3M was out of compliance at the time of the inspection in paragraphs 1 - 6, below.

EPA has also determined that 3M violated RCRA requirements related to recording keeping, as described in paragraph 7, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

1. Hazardous Waste Accumulation Container Requirements

Under Ill. Admin. Code tit. 35 § 722.134(b), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status,

provided that the unit is emptied at least once every 90 days. A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 35 IAC 702, 703, and 724 through 728 [40 CFR parts 264 and 265 and the permit requirements of 40 CFR part 270] unless he has been granted an extension to the 90-day period.

At the time of the inspection, 3M had six tanks storing hazardous waste that were not being emptied at least once every 90 days. Two of the hazardous waste storage tanks were located in building 23, and the other four were located in building 3.

2. When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2), a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, 3M was accumulating two containers of hazardous waste without the accumulation start dates. One container was a tanker trailer containing spent solvent located at building 18's less than 90-day hazardous storage area. The other was a 55-gallon container of corrosive waste located at building 3's less than 90-day hazardous waste storage area. The corrosive waste container located at building 3 was dated during the inspection.

3. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3), a large quantity generator must clearly mark each container and tank holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection 3M was accumulating hazardous waste in one container without the words "Hazardous Waste." The container was a tanker trailer containing spent solvent located in building 18's less than 90-day hazardous waste storage area.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 4 - 6 are also independent TSD requirements

incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of 3M to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 CFR Part 265].

4. Subpart I Container Requirements

Under Ill. Admin. Code tit. 35 IAC §§ 722.134(a)(1)(A) and 725.274, a large quantity generator must inspect, at least weekly, areas where hazardous waste containers are stored. The owner or operator must look for leaking containers and deterioration of containers.

Based on the documents received from 3M, 3M did not inspect the less than 90-day hazardous waste storage area in building 18 during the week of October 15-21, 2017.

Under Ill. Admin. Code tit. 35 IAC §§ 722.134(c)(1) and 725.273(a), a large quantity generator of hazardous waste must ensure that containers holding hazardous waste are always closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, 3M had one 55-gallon container holding hazardous waste liquids with an unsecure lid while no one was adding or removing waste. The 55-gallon container was located in building 18.

5. Subpart BB Requirements

Under Ill. Admin. Code tit. 35 IAC § 725.956(a)(1) [40 C.F.R. § 265.1056(a)(1)], each open-ended valve or line shall be equipped with a cap, blind flange, plug or a second valve.

At the time of the inspection, 3M had four open-ended valves that were not equipped with a cap, blind flange, plug or a second valve. Two were located in the building 18 solvent handling area and the other two were located in building 20.

6. Subpart CC Requirements

Under Ill. Admin. Code tit. 35 IAC §§ 722.134(a)(1)(A) and 725.987(d)(3)(A)(ii) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.1087(d)(3)(A)(ii)], whenever a hazardous waste is in a container using Level 2 controls, the owner or operator shall install all covers and closure devices for the container and secure and maintain each closure device in the closed position except when discrete quantities or batches of material intermittently are added to the container over a period of time, the owner or operator must promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15

minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.

At the time of the inspection, 3M had two tanker trucks holding spent solvent with open hatches while no one was adding to or removing waste from the containers. One open hatch was observed in building 18 with a reading of 12,000 ppm using the Thermo Scientific toxic vapor analyzer 1000B (TVA). The second open hatch was observed in building 16 with a reading of 6,000 ppm using the TVA.

Under Ill. Admin. Code tit. 35 IAC §§ 725.987(d)(1)(A), 725.987(d)(1)(B), and 725.987(d)(1)(C) [40 C.F.R. §§ 265.1087(d)(1)(A), 265.1087(d)(1)(B), and 265.1087(d)(1)(C)], a container using Container Level 2 controls is one of the following: (A) A container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as specified in subsection (f). (B) A container that operates with no detectable organic emissions, as defined in Section 725.981, and determined in accordance with the procedure specified in subsection (g); and (C) A container that has been demonstrated within the preceding 12 months to be vapor-tight by using Reference Method 27 (Determination of Vapor Tightness of Gasoline Delivery Tank Using Pressure-Vacuum Test) in appendix A to 40 CFR 60 (Test Methods), incorporated by reference in 35 Ill. Adm. Code 720.111(b), in accordance with the procedure specified in subsection (h).

At the time of the inspection, 3M could not produce documentation that any of the three Level 2 container options (DOT requirements, operating with no detectable organic emissions, or vapor-tight) were being met for four tanker trucks holding spent solvent.

Under Ill. Admin. Code tit. 35 IAC § 725.987(d)(4)(b) [40 C.F.R. § 265.1087(d)(4)(ii)], if a container used for managing hazardous waste remains at the facility for a period of one year or more, the owner or operator must visually inspect the container and its cover and closure devices initially and thereafter, at least once every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the owner or operator must repair the defect in accordance with the requirements of subsection (d)(4)(C)

At the time of the inspection, 3M was not meeting the requirements of Subpart CC by not conducting the required thorough inspections of the tanker containing hazardous waste in building 18's less than 90-day area.

By failing to comply with the conditions for a permit exemption, above, 3M became an operator of a hazardous waste storage facility and was required to obtain an Illinois hazardous waste

storage permit. 3M failed to apply for such a permit. 3M's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring 3M to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 - 6, above.

At the time of the inspection, 3M violated the following recordkeeping requirement:

7. Recordkeeping Requirements

Under Ill. Admin. Code tit. 35 § 722.140(c), a generator must keep records of any test results, waste analyses, or other determinations made in accordance with § 722.111(c) [40 C.F.R. § 262.11] for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

At the time of the inspection, 3M did not have documentation of waste determinations for waste disposed from their building 23 blowdown tanks (silo tanks).

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken since the inspection to establish compliance with the above permit exemption conditions described in paragraphs 1 - 6, and the recordkeeping violation in paragraph 7. You should submit your response to: Graciela Scambiatterra, of my staff, at: U.S. EPA, Region 5, 77 West Jackson Boulevard, ECR-17J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Graciela Scambiatterra, of my staff, at 312-353-5103 or at scambiatterra.graciela@epa.gov.

Sincerely,

Mardi Klevs

Mardi Klevs
Chief, Land and Chemicals Enforcement and Compliance Assurance Branch

Enclosure

cc: Mr. Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEIC

NEICVP1272E01

RESOURCE CONSERVATION AND RECOVERY ACT COMPLIANCE INVESTIGATION REPORT

3M Company
22614 Route 84N
Cordova, Illinois
NEIC Project No.: VP1272

August 2018

Project Manager:
LAWRENCE LUTZ Digitally signed by LAWRENCE LUTZ Date: 2018.08.20 18:38:13 -06'00'
Craig Lutz, Chemical Engineer

Other Contributor:
Lorna Goodnight, Environmental Engineer

Prepared for:

EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Authorized for Release by:
REBECCA CONNELL Digitally signed by REBECCA CONNELL DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=REBECCA CONNELL, dnQualifier=00000025782 Date: 2018.06.24 08:51:35 -06'00'
Rebecca Connell, Field Branch Chief

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
P.O. Box 25227
Building 25. Denver Federal Center
Denver, Colorado 80225

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INTRODUCTION

At the request of U.S. Environmental Protection Agency (EPA) Region 5, the EPA National Enforcement Investigations Center (NEIC) conducted a Resource Conservation and Recovery Act (RCRA) compliance investigation of the 3M Company (3M) facility located at 22614 Route 84N in Cordova, Illinois.

This report presents NEIC's field observations during the March 5-9, 2018, on-site inspection. The information presented in this report was collected from personnel interviews, direct observations, company-provided documentation, and state and federal government databases.

FACILITY BACKGROUND

3M is a RCRA large quantity generator (LQG) of hazardous waste (EPA ID No. ILD054236443). 3M's production operations and associated waste streams are subject to major environmental statutes, including RCRA; the Clean Air Act (CAA); the Clean Water Act (CWA); and the Emergency Planning and Community Right-to-Know Act (EPCRA). Its operations are also subject to environmental permits and regulations administered by the EPA and the Illinois Environmental Protection (IEPA). At one time, 3M was a permitted treatment storage and disposal facility (TSD) operating an incinerator, surface impoundment, tanks, and container storage areas under a hazardous waste permit. The last permitted unit was closed in June 1997.

3M operates a specialty chemical and adhesive manufacturing facility. The facility site is approximately 670 acres located along the Mississippi River, of which 120 acres are developed. 3M operates four less-than-90-day hazardous waste storage areas.

INVESTIGATION METHODS

NEIC performed the following activities to accomplish the investigation objectives:

- Met with facility personnel to discuss process operations, waste determinations, and recordkeeping in compliance with the Illinois Administrative Code (IAC) provision implementing the RCRA rules at 40 Code of Federal Regulations (CFR) Subparts BB, and CC.
- Conducted walk-through tours of the facility to observe process operations.
- Performed leak detection and repair (LDAR) and fugitive emissions monitoring of equipment in hazardous waste service following the current version of the NEIC operating procedure *Toxic Vapor Analyzer (TVA)*, NEICPROC/00-016.
- Surveyed equipment for volatile organic compound (VOC) emissions using a forward-looking infrared (FLIR) GF320 GasFinder infrared (IR) camera following the current version of NEIC operating procedure *FLIR ThermaCAM™ GasFindIR, GF320, and Similar Infrared Cameras*, NEICPROC/11-005.

- Reviewed and copied (as appropriate) facility documents, including operating plans, procedures, and records. Specifically, NEIC reviewed 3M's records associated with RCRA Subparts BB and CC.

All activities of NEIC personnel were performed in accordance with the NEIC quality system.

ON-SITE INSPECTION SUMMARY

NEIC conducted the on-site inspection of 3M from March 5-9, 2018. The inspection team included Craig Lutz (project manager) and Lorna Goodnight from NEIC, as well as Graciela Scambiatterra from EPA Region 5. During the opening meeting on March 5, 2018, credentials were presented to Rich Stutzki, 3M environmental health and safety manager.

NEIC conducted a process review of 3M's operations. During this review, NEIC examined the process operations, management of hazardous wastes, and 3M's LDAR program. NEIC's process review was based on discussions with facility personnel, records reviews (hard copy and digital), and a tour of the operational areas. Following the process review, NEIC inspected the process units and performed LDAR monitoring on equipment subject to RCRA Subparts BB and CC.

At the conclusion of the on-site inspection on March 9, 2018, NEIC held an exit conference with 3M personnel to discuss preliminary inspection observations. During the exit conference, NEIC advised 3M that final compliance determinations would be made by EPA Region 5. Before leaving the site, the inspection team provided 3M a complete list of all documents received on-site by NEIC. 3M was also provided logs and copies of all photographs and videos taken by NEIC.

INVESTIGATION ACTIVITIES

As discussed previously, 3M is a large quantity generator of hazardous waste operating under EPA ID No. ILD054236443. 3M generates hazardous wastes subject to the IAC regulations implementing requirements of 40 CFR Part 265 Subparts BB and CC. NEIC's objective for this investigation was to evaluate 3M's compliance with those regulations.

Process Description

3M's primary business is chemical manufacturing. 3M operates batch and continuous/semi-continuous processing units. Processing unit operations are flexible, allowing 3M to modify operations to meet the formulary requirements of the various products manufactured on site. NEIC conducted a process review during the on-site inspection. 3M claimed all process-related information as confidential business information (CBI).

Storage

3M does not have any permitted hazardous waste tanks on-site. At the time of the inspection, 3M was not managing any tanks as less-than-90-day hazardous waste tanks.

3M operates four less-than-90-day areas where containers of hazardous waste are managed. The less-than-90-day areas are located in the building 1 lab, building 3, the warehouse, and outside of building 18. The building 1 lab area receives wastes such as contaminated debris, bottles with residuals, and personal protective equipment. The building 3 area receives wastes associated with the processes in buildings 3 and 23. The warehouse receives wastes collected from throughout the facility. The building 18 area contained 330-gallon totes and a tanker truck of spent solvents that were used to clean process reactors. A pump station is located next to the building 18 storage area. The pump is used to consolidate spent solvent hazardous wastes that are sent to 3M's incinerator in Cottage Grove, Minnesota, or to WRR Environmental Services (WRR) for reclamation. Reclamation began in 2016 and is dependent on WRR's capacity to receive waste. The spent solvents are manifested as a hazardous waste to these facilities.

Reactor Cleanings

Process reactors are cleaned by filling the reactors with solvent. Some reactors are pressurized with up to 10 pounds of pressure (high-pressure solvent boil), others are cleaned at atmospheric pressure. Typically, the same solvent required for the specific reactors product is used to clean the reactor. After the cleaning is complete, the solvent is drained to a tote or tanker truck. Some reactors are rinsed with water after the solvent cleaning. The water rinse is flushed to a container or the process sewer, depending on the cleaning procedure used by 3M for that specific product. After the solvent wash, if the same solvent used in cleaning will be used in the next product's reaction, the reactor is visually inspected; if the reactor is free of polymer, the reactor is ready for the next reaction.

Buildings 3 and 23 – Process Air Emissions Condensate

Buildings 3 and 23 each have a vent system that collect air emissions from the process equipment contained in each building. The vent systems are designed to collect condensates from the air emissions stream and collect the liquids in tanks.

Building 3's condensate collection system is on the roof. The vent stream passes through vent tanks, where entrained liquids in the vent stream drop out. The vent tanks drain into blowdown tanks on the roof (**Appendix A**, photos 2 and 3). There are nine blowdown tanks, and each has two vent tanks that drain into it. 3M visually checks the blowdown tanks to determine if they contain material. If there is material in the tanks, 3M collects samples to characterize the material in the tank. High organic material is drummed by draining the blowdown tanks to containers on the third floor for shipment to off-site disposal as a hazardous waste. 3M can also drain the blowdown tanks to the wastewater system.

Building 23 has eight vent tanks on the roof (**Appendix A**, photo 8) that collect entrained liquids from the vent streams. The vent tanks drain to two silo tanks that are located on each side of building 23. A 3M procedure requires the silo tanks to be cleaned out annually. 3M samples the contents of the silo tanks to determine if the material should be disposed of off-site as a hazardous waste or discharged into the wastewater treatment system.

RCRA Subpart BB

Equipment associated with permitted or less-than-90-day hazardous waste tanks or container systems is subject to RCRA Subpart BB (40 Code of Federal Regulations § 265.1050(b)) if it contains or contacts hazardous waste with greater than or equal to 10 percent organics. Equipment regulated under RCRA Subpart BB includes valves, pumps, compressors, relief devices, sampling systems, and connectors/flanges. According to the inventory provided by the facility representatives (**Appendix B**), 3M has 121 valves, 365 connectors and 1 pump associated with the hazardous waste containers in the LDAR program. A contractor, Monroe, performs the LDAR monitoring for 3M using a flame ionizing detector (FID). Monitoring is performed monthly on the pump and annually on all other components, as allowed by regulation, based on the current leak rates. All equipment has a metal tag with a unique identification number, and the LDAR contractor maintains the equipment master list. The semiannual report for July-December 2017 contained the results for the most recent annual monitoring. Records for precision testing and instrument calibration were included in the report. No leaks were found.

During the on-site inspection, NEIC performed comparative LDAR monitoring. On March 7, 2018, Craig Lutz performed LDAR monitoring using a Thermo Scientific toxic vapor analyzer (TVA) 1000B. **Table 1** contains a summary of equipment subject to RCRA Subpart BB that NEIC monitored. No leaks were detected.

Table 1. SUMMARY OF EQUIPMENT MONITORED DURING ON-SITE INSPECTION
3M Company
Cordova, Illinois

Valves	Connectors	Pumps	Open-ended lines	Tanker hatches
70	1	1	4	3

All field measurements/monitoring described in this report are within the scope of NEIC's ISO/IEC 17025 accreditation issued by the ANSI-ASQ National Accreditation Board (certificate No. AT-1646).

RCRA Subpart CC

The largest hazardous waste stream generated on-site is from reactor cleanouts. Each reactor has a designated standard operating procedure (SOP) that includes instructions on how to wash the reactor, and the solvent to use. The spent solvent containers are generated from reactor cleanouts and kept in the building 18 less-than-90-day storage area and are subject to the

requirements of RCRA Subpart CC. When totes of spent solvent are filled after reactor cleanings, the totes are moved to the reactor area, hooked up, and filled. The totes are moved to the building 18 less-than-90-day area. The totes are pumped, using a pump located in the outside building 18 area, into a tanker truck for shipment off-site. When a large reactor is cleaned out, spent solvent may go directly to a tanker. Tankers are sent to WRR Environmental Services or to 3M's incinerator. It typically takes about 4-5 hours for reactors in the internals area and about 12 hours for reactors in the electronics area to be emptied of spent solvent. Waste solvent totes are sent to Industrial Container Services (ICS) for cleaning and recertification. There are 78 dedicated waste solvent totes that are used on-site. Empty totes are staged in a storage area between buildings 3 and 23. Every dedicated waste solvent tote is tested and certified as U.S. Department of Transportation (DOT) compliant every 2.5 years. A new "expiration date" is then placed on the tote.

SUMMARY OF FINDINGS

The following table summarizes the findings and observations of NEIC's on-site inspection and follow-up review of facility-provided files. Areas of noncompliance (AON) pertain to areas or issues identified by NEIC that may have potential compliance implications, but are neither inclusive nor exclusive of all such potential areas or issues. Areas of concern are inspection observations of potential problems/activities that could impact the environment, result in future noncompliance with permit or regulatory requirements, and/or are areas associated with pollution prevention issues. EPA Region 5 will assess the applicability of regulatory requirements based on its review of this report and other technical, regulatory, and facility information.

Areas of noncompliance are designated and organized by number, while areas of concern are designated and organized by letter. These are linked to specific supporting documents, including photographs taken during the NEIC inspection **(Appendix A)**.

RESOURCE CONSERVATION AND RECOVERY ACT			
AREAS OF NONCOMPLIANCE			
	Regulatory Citation	**Finding/Observation**	**Evidence Reference**
1	*35 Illinois Administrative Code (IAC) § 722.134(c)(1) [40CFR § 262.15(a)(4)] A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §722.131 or 721.133(e) [40 CFR §261.31 or §261.33(e)] in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) or (d) of this section provided the generator does the following:* *A) The generator complies with 35 IAC §§725.271, 725.272, and 725.273(a) [40 CFR §§265.171, 265.172, and 265.173(a)]* *35 IAC §725.273(a) [40 CFR 262.17(a)(1)(iv)] **Management of containers** – A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.*	**NEIC inspectors observed a 55-gallon satellite accumulation drum with an unsecured lid in building 18.** The drum had an unsecured lid (Photo 14) and the content was labeled hazardous waste liquids (Photo 15). RCRA Online Number 14862 dated 11/03/2011 states that EPA considers satellite accumulation containers containing liquids closed when all opening or lids are properly and securely affixed to the container.	**Appendix A – NEIC Photographs**, Photo 14 and 15

2	*35 IAC § 722.134 (a) [40 CFR § 262.17(a)(5)]] – Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:* *(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container*	**NEIC inspectors observed one drum in the building 3 less-than-90-day storage area that did not have an accumulation date.** NEIC observed and photographed the drum on March 6, 2018. According to the hazardous waste label, the drum contained a corrosive waste comprised of rags, gloves, bags, filters and mops contaminated with calcium fluoride. 3M personnel dated the drum later that day.	**Appendix A – NEIC Photographs,** Photo 7
3	*35 IAC § 722.134 (a) [40 CFR § 262.17(a)(5)(C)] – Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:* *(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;* *(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste";*	**NEIC inspectors observed one tanker trailer containing spent solvent in the building 18 storage area that was undated and not labeled with the words "Hazardous Waste."**	**Appendix A – NEIC Photographs,** Photos 19, 20, 21, and 22
4	*35 IAC § 722.140(c) [40 CFR §262.11(f)] A generator must keep records of any test results, waste analyses, or other determinations made in accordance with §722.111(c) [40 CFR §262.11] for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.*	**3M could not provide documentation for the waste disposed of from the building 23 blowdown tanks (silo tanks) tanks.** On April 4, 2014, 3M drained material out of the building 23 blowdown tanks (silo tanks) tanks and documented that the material was scrapped out (**Appendix C**). The 3M representatives clarified that "scrapped out" means that the material was disposed of as hazardous waste. 3M's practice is to evaluate the waste in the tank to determine if it can be drained to the wastewater treatment system or sent off-site for disposal as a hazardous waste. When the waste is sent off-site for disposal, it is 3M's practice to collect a sample and have it analyzed to characterize the material in the tank. 3M could not locate the analytical results for this disposal event. 3M was also unable to find the waste profile for this waste stream in its internal tracking system. The waste profile would show the hazardous waste codes. Without the waste profile, 3M could not locate a hazardous waste manifest.	**Appendix C – Production Safety Sheet for Draining Silo Tanks on Building 23**

5	*35 IAC § 725.956(a)(1) [40 CFR §265.1056(a)(1)] – Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve.*	**During the Subpart BB comparative monitoring, NEIC inspectors observed four open-ended valves that were not equipped with a cap, blind flange, plug, or second valve.** 3M personnel corrected the open-ended lines during the inspection. NEIC inspectors observed the first two open-ended lines in the building 18 solvent handling area: one on a filter (**Appendix A,** photos 12 and 13) and one on a dip pipe (**Appendix A,** photo 11), with a 6,000 parts per million (ppm) reading from the TVA. The other two open-ended lines were observed in building 20: one on the first floor (**Appendix A,** photo 16), and one the second floor.	**Appendix A – NEIC Photographs,** Photos 11, 12, 13 and 16
6	*35 IAC § 722.134 (a) [40 CFR §262.17(a)(1)(i)] – …a generator may accumulate hazardous waste on-site for 90 days or less without a permit… provided that:* *(1) The waste is placed in or one of the following types of unites and the generator complies with the applicable requirements:* *(A) In containers and the generator complies with the applicable requirements of subparts I, AA, BB, and CC of 35 IAC Code 725* *35 IAC §725.987(d)(3) [40 CFR §265.1087(d)(3)] – Whenever a hazardous waste is in a container using Container Level 2 controls, the owner or operator shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as follows:* *(A) Opening of a closure device or cover is allowed for the purpose adding hazardous waste or other materials to the container, as follows:* *(i) If the container is filled to the intended final level in one continuous operation, the owner or operator must promptly secure the closure devices in the closed position and install the covers, as applicable to the container, upon conclusion of the filling operation; and*	**During LDAR monitoring, on March 7, 2018, NEIC inspectors observed two open hatches on tanker trucks that contained waste solvent.** NEIC inspectors observed an open hatch on a tanker truck that was being filled in the building 18 solvent handling area (**Appendix A, photo 10, and Appendix D**). A reading of 12,000 ppm was observed. There was material in the tanker, and the 3M employee (Bill Conner) responsible for the filling operations was not in the area. B. Conner later joined the inspection team and 3M personnel and stated that he was filling the tanker but was called away. He said it typically takes about 8 hours to fill a tanker truck. NEIC inspectors requested a copy of the "fill sheet" detailing what was going into the tanker. 3M's March 23, 2018, email states that a fill sheet could not be located (**Appendix E**). NEIC inspectors observed another open tanker hatch during LDAR monitoring in the building 16 unloading area (**Appendix A, pboto 17**). The tanker had received solvent used to clean the area around a reactor. At the time NEIC inspectors observed the open hatch, material was not actively being added to the tanker (**Appendix F**). NEIC observed a reading of 6,000 ppm, but the monitor did not allow the instrument time to peak due to safety concerns.	**Appendix A – NEIC Photographs,** Photos 10 and 17 **Appendix D** – FLIR Video **Appendix E** – 3M's March 23, 2018, Email **Appendix F** – FLIR Video

	(ii) If discrete quantities or batches of material intermittently are added to the container over a period of time, the owner or operator must promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first;.		
7	*35 IAC § 722.134 (b) [40 CFR §262.17(a)] – A generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in 35 IAC 721.131 or 721.133(e) in a calendar month, that accumulates hazardous waste or acute hazardous waste for more than 90 days is an operator of a storage facility. Such a generator is subject to the requirements of IAC 724, 725, and 727 and the permit requirements of 35 IAC 702, 703, and 705, unless the generator has been granted an extension of the 90-day period. If hazardous wastes must remain on-site for longer than 90 days due to unforeseen, temporary, and uncontrollable circumstances, the generator may seek an extension of up to 30 days by means of a variance or provisional variance, pursuant to Sections 35(b), 36(c), and 37(b) of the Environmental Protection Act [415 ILCS 5/35(b), 36(c), and 37(b)] and 35 IAC 180.*	**3M is operating six tanks storing hazardous waste without a permit.** Building 3's vent tanks discharge to blowdown tanks. Some process vents from building 3 vent to the atmosphere. Each blowdown tank receives liquids from two vent tanks, for a total of four blowdown tanks (and eight vent tanks) on the roof of building 3. The blowdown tanks are open to the atmosphere, but have a roof-like cover. The blowdown tanks also collect material if a reactor's rupture disk releases material. 3M personnel stated that the liquid in the blowdown tanks is mostly water. Blowdown tanks B5 and B7 were drained on September 9, 2017. On February 23, 2018, blowdown tank B3 was identified as needing cleaning (**Appendix G**) Building 23's vent tanks discharge to one of two silos located on either side of building 23. 3M's preventative maintenance procedure requires annual inspections of the tanks, and draining if the level shows liquid in the tanks. 3M personnel stated that the tanks are drained more often than once a year, but they do not think records are kept. Before a tank discharges, a sample is collected, and operators perform a visual and olfactory inspection. If they observe an issue, the sample may be analyzed by gas chromatography (GC) or drummed (without GC) and sent off-site for disposal as a hazardous waste. If no issues are observed, the liquid is drained to the chemical sewer. 3M does	**Appendix C** – Production Safety Sheet for Draining Silo Tanks on Building 23 **Appendix G** – Production Safety Sheet for Draining Blowdown Tanks on Building 3 **Appendix H** – Vent Tanks for Buildings 3 and 23

		not retain records of analytical data from the silos and blowdown tanks. On April 4, 2014, 3M drained material out of the building 23 silo tanks and documented that the material was "scrapped out" (**Appendix C**). 3M representatives confirmed that this was a term for disposing of the tank contents as hazardous waste. 3M could not locate the analytical results for this disposal event. 3M was also unable to find the waste profile for this waste stream in its internal tracking system. The waste profile would show the hazardous waste codes applied to the waste. 3M provided NEIC a list of vent tanks for buildings 3 and 23 and identified whether the processes that vented to each vent tank were water-based, solvent-based, or both, depending on the product (**Appendix B**)	
8	*35 LAC § 725.987(d)(1) [40 CFR §265.1087(d)(1)] – A container using Container Level 2 controls is one of the following:* *(A) A container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as specified in subsection (f).* *(B) A container that operates with no detectable organic emissions, as defined in Section 725.981, and determined in accordance with the procedure specified in subsection (g); and.* *(C) A container that has been demonstrated within the preceding 12 months to be vapor-tight by using Reference Method 27 (Determination of Vapor Tightness of Gasoline Delivery Tank Using Pressure-Vacuum Test) in appendix A to 40 CFR 60 (Test Methods), incorporated by reference in 35 Ill. Adm. Code 720.111(b), in accordance with the procedure specified in subsection (h).*	**The tankers used for hazardous waste management (four tankers) in building 18's less-than-90-day area do not meet the requirements of RCRA Subpart CC Level 2 controls.** During the on-site inspection, 3M could not produce documentation that any of the three Level 2 container options (DOT requirements, operating with no detectable organic emissions, or vapor-tight) were being met. 3M's April 13, 2018, email to NEIC (**Appendix E**) states "To date, 3M could not locate records that show the four tankers meet one of the three Level 2 container options specified in 40 CFR 265.1087(d)(1). 3M subsequently ceased using these four tankers to collect waste. In addition, 3M began using DOT certified hazmat tankers that meet 40 CFR 265.1087(d)(1)(i) to collect waste." NEIC inspectors have not received a response from 3M on how the facility meets the requirements of 40 CFR §265.1087(d)(1).	**Appendix E** – 3M Cordova Response to EPA requests 3-23-2018

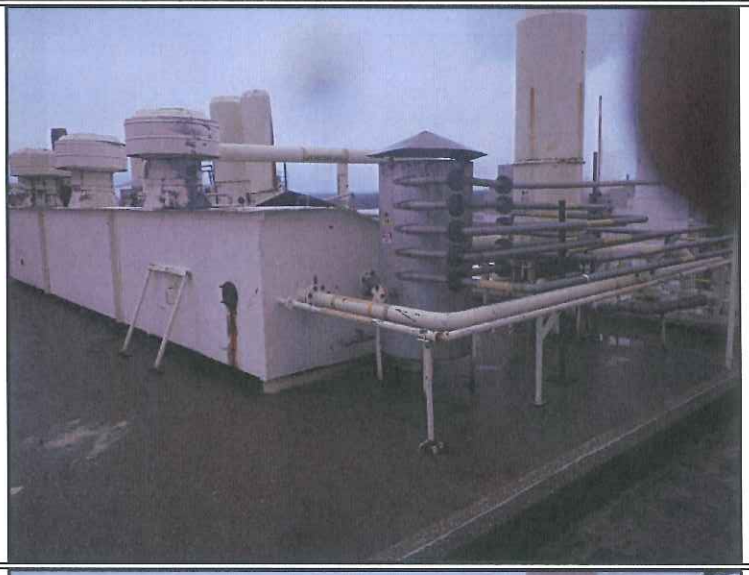
9	*35 IA § 725.987(d)(4)(B) [40 CFR §265.1087(d)(4)(ii)] – If a container used for managing hazardous waste remains at the facility for a period of one year or more, the owner or operator must visually inspect the container and its cover and closure devices initially and thereafter, at least once every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, the owner or operator must repair the defect in accordance with the requirements of subsection (d)(4)(C);*	**Inspections of the tanker containing hazardous waste in building 18's less-than-90-day area do not meet the requirements of RCRA Subpart CC.** 3M provided NEIC with less-than-90-day area inspection logs to show compliance with RCRA Subpart CC for the building 18 hazardous waste tanker (**Appendix I**). The inspection logs do include the statement "No evidence of leaks from containers," but do not satisfy the more thorough inspection requirements, including checking for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position, as required.	**Appendix I** – Weekly Hazardous Waste Inspection Form

10	*35 IAC § 722.134 (a) [40 CFR §262.17(a)(1)(v)] – Except as provided in subsection (d), (e), (f), (g), (h), or (i) of this Section, a generator is exempt from all the requirements in Subparts G and H of 35 IAC 725, except for 35 IAC 725.211 and 725.214, and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the following conditions are fulfilled:* **35 IAC § 725.274*) [40 CFR §265.174]*** *– At least weekly, the owner or operator must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors.*	**Inspections of the building 18's less-than-90-day area were not conducted for the week of October 15 – 21, 2018 (Appendix I, page 9).**	**Appendix I** – Weekly Hazardous Waste Inspection Form

3M Cordova

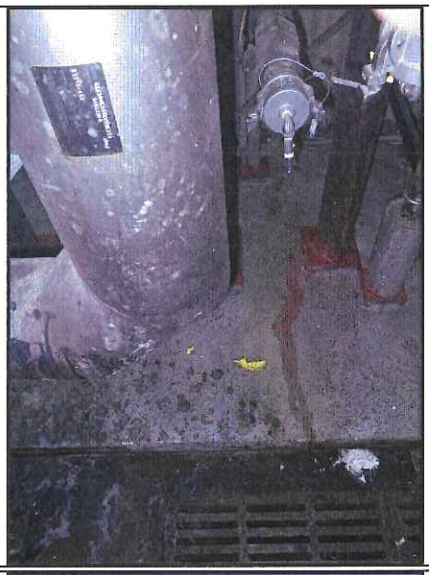
Attributes	
Photo Number	1
File Name	RIMG0089.JPG
Date/Time	3/6/2018 8:35:16 AM
Photographer	C. Lutz
Description	Aerobic digester at the wastewater treatment plant

Attributes	
Photo Number	2
File Name	RIMG0090.JPG
Date/Time	3/6/2018 9:18:32 AM
Photographer	C. Lutz
Description	Building 3 roof - vent tank (silver) that discharges into blowdown tanks

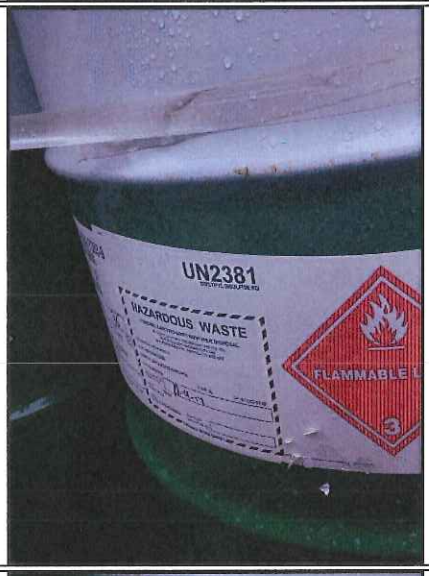


Attributes	
Photo Number	3
File Name	RIMG0091.JPG
Date/Time	3/6/2018 9:18:37 AM
Photographer	C. Lutz
Description	Building 3 roof - vent tank (silver) that discharges into blowdown tanks

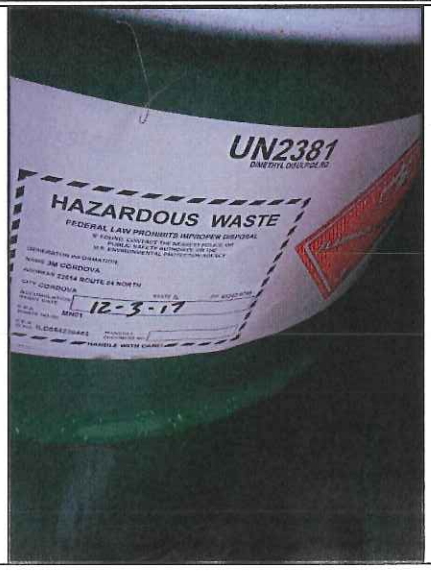
Attributes	
Photo Number	4
File Name	RIMG0092.JPG
Date/Time	3/6/2018 9:31:37 AM
Photographer	C. Lutz
Description	Building 3 roof - line from blowdown tank



Attributes	
Photo Number	5
File Name	RIMG0093.JPG
Date/Time	3/6/2018 9:54:01 AM
Photographer	C. Lutz
Description	Building 3 90 day storage area - drum dated 12/4/17

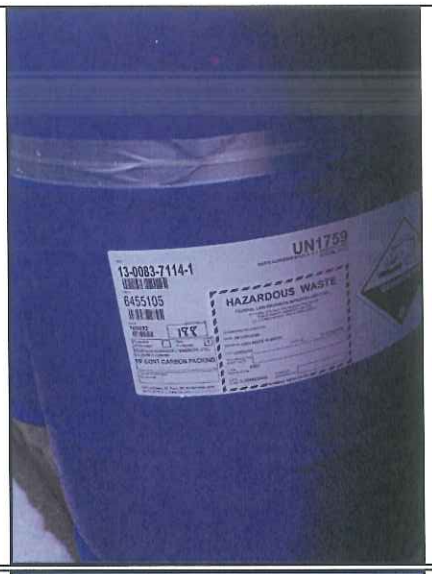


Attributes	
Photo Number	6
File Name	RIMG0094.JPG
Date/Time	3/6/2018 9:54:14 AM
Photographer	C. Lutz
Description	Building 3 90 day storage area drum - dated 12/3/17

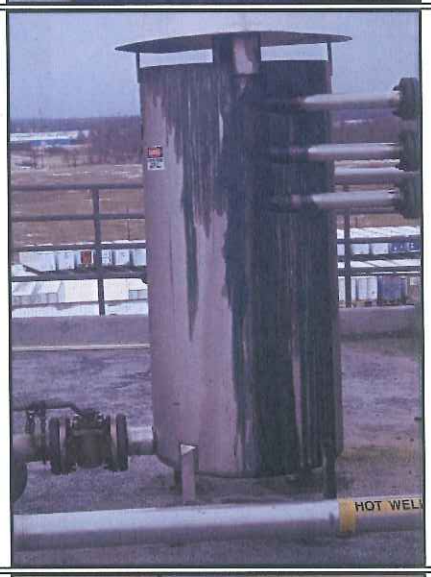


3M Cordova

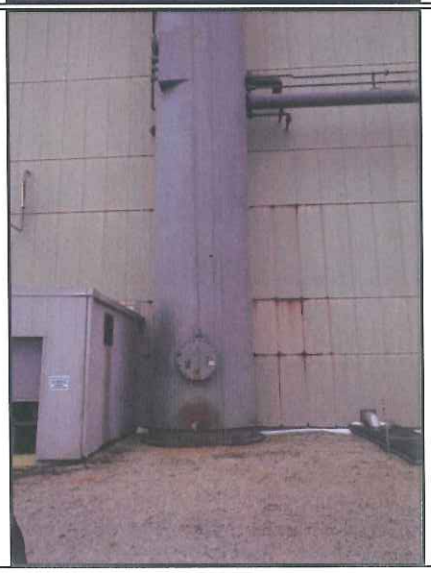
Attributes	
Photo Number	7
File Name	RIMG0095.JPG
Date/Time	3/6/2018 9:58:02 AM
Photographer	C. Lutz
Description	Building 3 90 day storage area - undated drum



Attributes	
Photo Number	8
File Name	RIMG0096.JPG
Date/Time	3/6/2018 10:21:30 AM
Photographer	C. Lutz
Description	Building 23 roof - vent tank

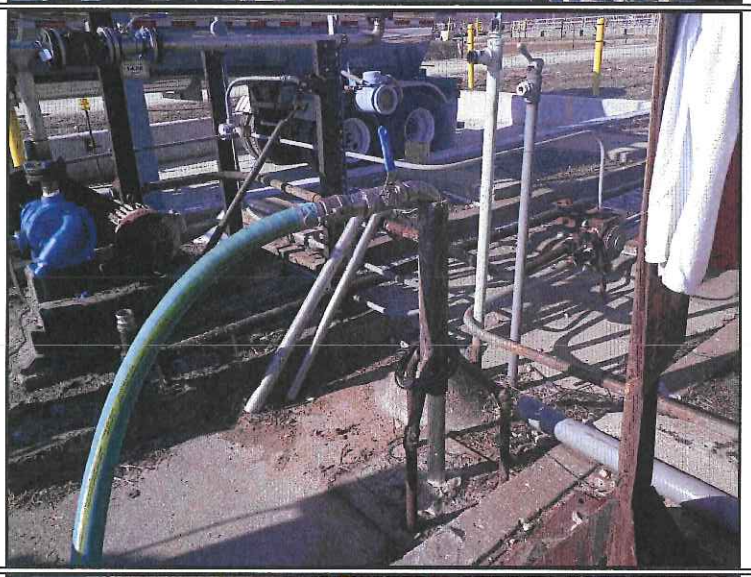


Attributes	
Photo Number	9
File Name	RIMG0097.JPG
Date/Time	3/6/2018 10:40:31 AM
Photographer	C. Lutz
Description	Building 23 - Silo tank that collects the material from the vent tanks on the roof



Attributes	
Photo Number	10
File Name	RIMG0098.JPG
Date/Time	3/7/2018 9:10:11 AM
Photographer	L. Goodnight
Description	Building 18 area - tanker with open hatch

Attributes	
Photo Number	11
File Name	RIMG0099.JPG
Date/Time	3/7/2018 9:12:38 AM
Photographer	L. Goodnight
Description	Building 18 fill hose

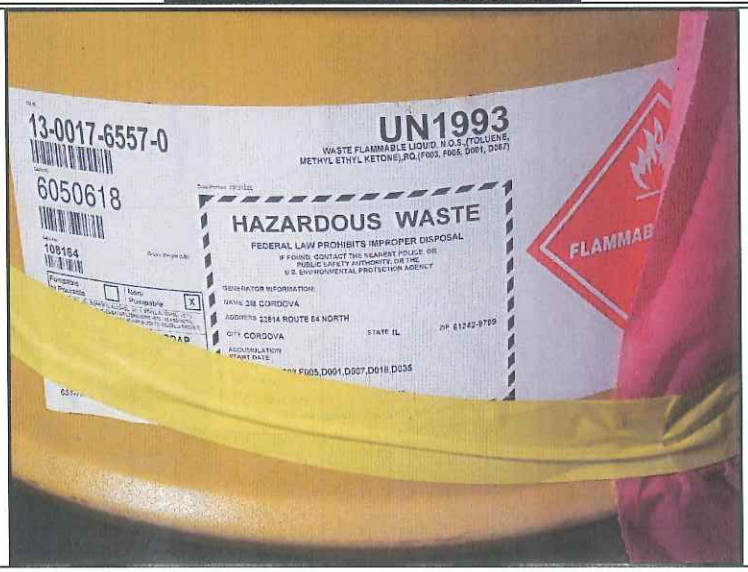


Attributes	
Photo Number	12
File Name	RIMG0100.JPG
Date/Time	3/7/2018 9:13:20 AM
Photographer	L. Goodnight
Description	Building 18 area - open-ended line off filter

Attributes	
Photo Number	13
File Name	RIMG0101.JPG
Date/Time	3/7/2018 9:13:51 AM
Photographer	L. Goodnight
Description	Building 18 area - open-ended line off filter

Attributes	
Photo Number	14
File Name	RIMG0102.JPG
Date/Time	3/7/2018 9:14:44 AM
Photographer	L. Goodnight
Description	Building 18 area SAA - lid not latched

Attributes	
Photo Number	15
File Name	RIMG0103.JPG
Date/Time	3/7/2018 9:15:23 AM
Photographer	L. Goodnight
Description	Building 18 area SAA - lid not latched



Attributes	
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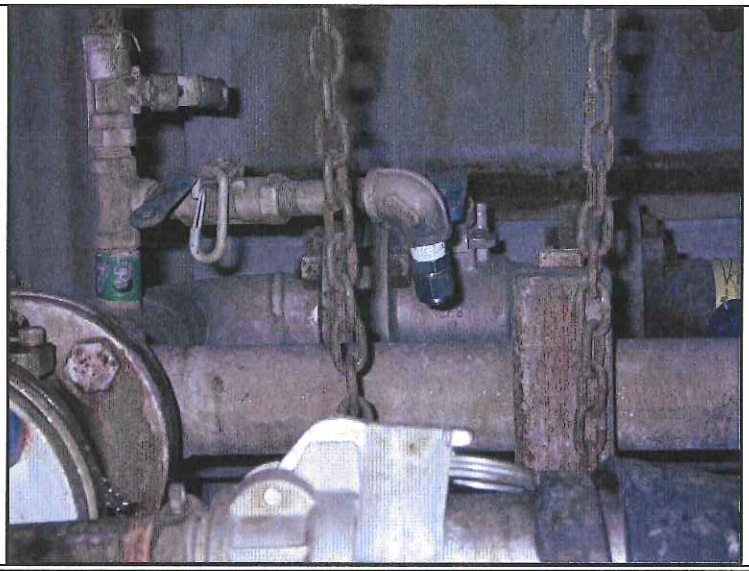
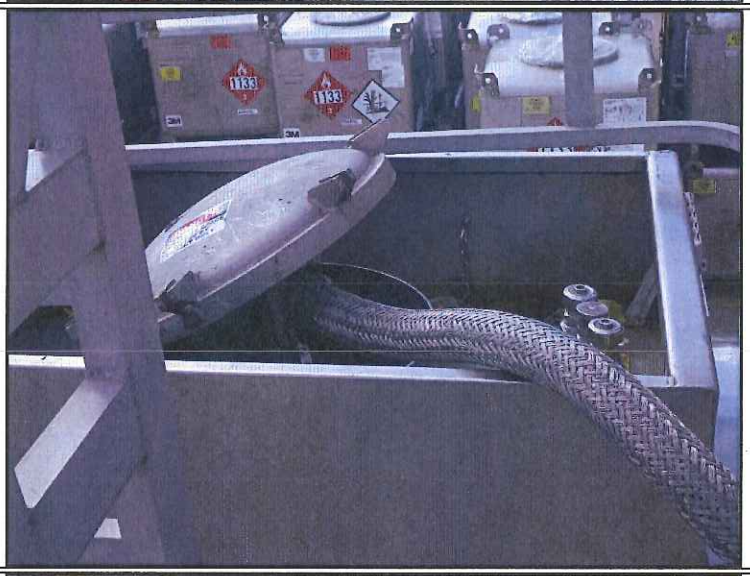
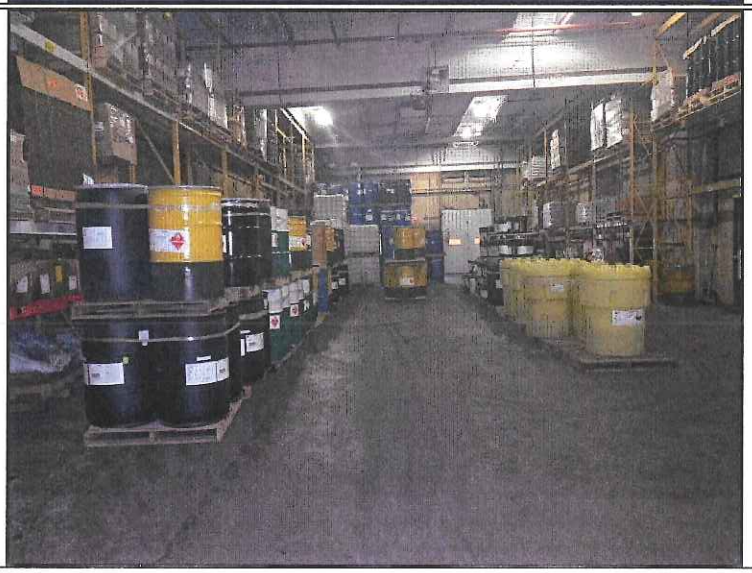
File Name	RIMG0104.JPG
Date/Time	3/7/2018 10:10:22 AM
Photographer	L. Goodnight
Description	Building 20, first floor open-ended line



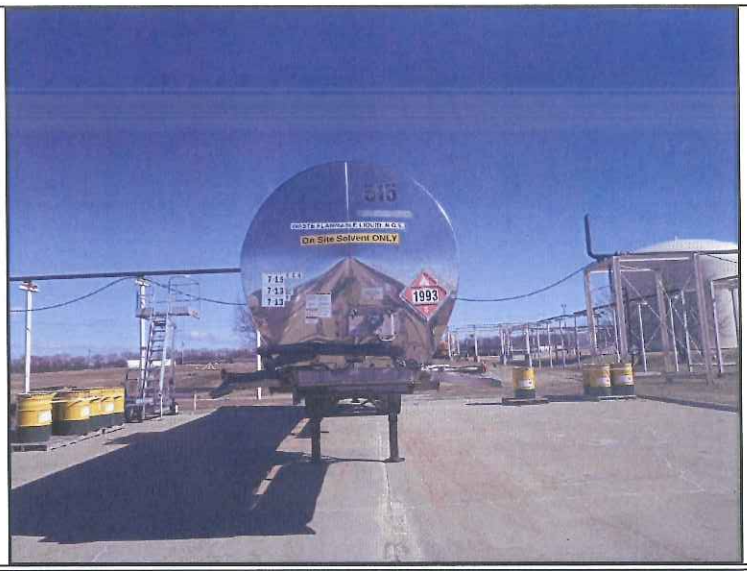
Attributes	
Photo Number	17
File Name	RIMG0105.JPG
Date/Time	3/7/2018 11:11:54 AM
Photographer	L. Goodnight
Description	Building 16 unloading area - tanker with open hatch



Attributes	
Photo Number	18
File Name	RIMG0106.JPG
Date/Time	3/8/2018 1:40:07 PM
Photographer	L. Goodnight
Description	Building 2 less-than-90-day area



Attributes	
Photo Number	19
File Name	RIMG0107.JPG
Date/Time	3/8/2018 2:13:07 PM
Photographer	L. Goodnight
Description	Building 18 tanker with no hazardous waste label



Attributes	
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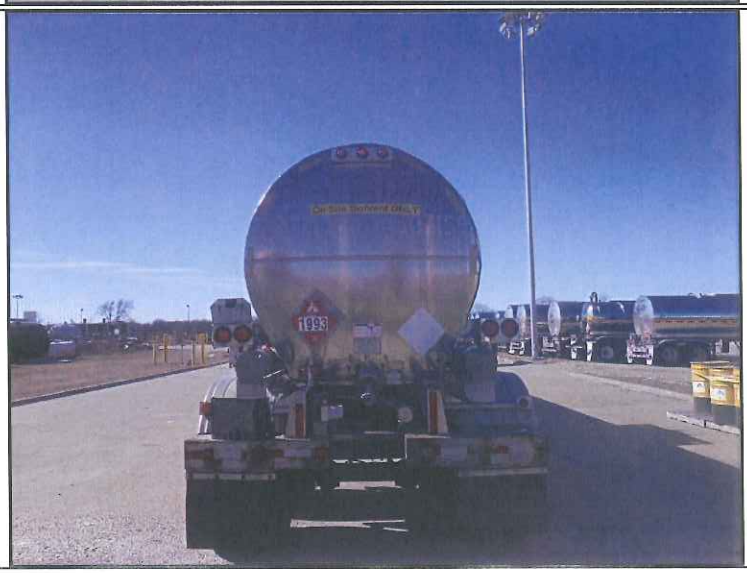
File Name	RIMG0108.JPG
Date/Time	3/8/2018 2:13:34 PM
Photographer	L. Goodnight
Description	Building 18 tanker with no hazardous waste label

Attributes	
Photo Number	21
File Name	RIMG0109.JPG
Date/Time	3/8/2018 2:14:00 PM
Photographer	L. Goodnight
Description	Building 18 tanker with no hazardous waste label



3M Cordova

Attributes	
Photo Number	22
File Name	RIMG0110.JPG
Date/Time	3/8/2018 2:14:20 PM
Photographer	L. Goodnight
Description	Building 18 tanker with no hazardous waste label

Attributes	
Photo Number	23
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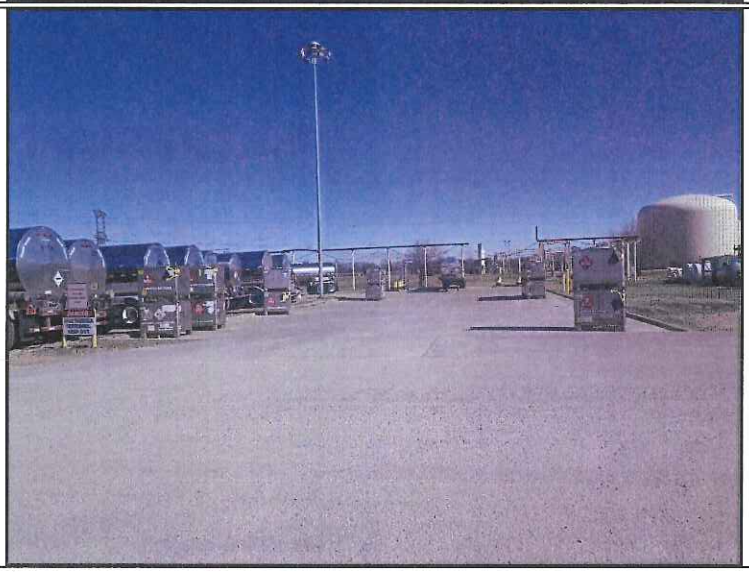
Date/Time	3/8/2018 2:16:43 PM
Photographer	L. Goodnight
Description	Building 18 less-than-90-day area



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RCRA-BB	1400	PUMP	BUILDING 18
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RCRA-BB	1395.2	CONNECTOR	BUILDING 18
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RCRA-BB	396	VALVE	BUILDING 20 TANKS
RCRA-BB	399	VALVE	BUILDING 20 TANKS
RCRA-BB	402	VALVE	BUILDING 20 TANKS
RCRA-BB	403	VALVE	BUILDING 20 TANKS
RCRA-BB	404	VALVE	BUILDING 20 TANKS
RCRA-BB	1456	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-01.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-01.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-02	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-02.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-02.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-03.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-03.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-04.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-04.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-04.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-04.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-05.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-05.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-06.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-06.2	CONNECTOR	BUILDING 20 TANKS

RCRA-BB	20-07.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-07.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-07.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-07.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-08.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-08.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-09.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-09.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-10.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-10.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-10.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-10.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-11.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-12	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-12.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-12.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-13.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-13.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-14	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-15.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-15.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-16.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-16.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17.5	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17.6	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17A.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17A.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17A.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-17A.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-18.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-18.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-19.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-19.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-20.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-20.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-21.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-21.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-25.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-25.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-26.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-26.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-27.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-27.2	CONNECTOR	BUILDING 20 TANKS

RCRA-BB	20-27.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-27.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-28.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-28.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-29.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-29.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-30.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-30.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-31.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-31.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-32.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-32.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-33.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-33.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-34	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-34.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-34.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-35.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-35.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-35.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-35.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-36.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-36.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-37.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-37.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-37.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-38.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-38.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-39.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-39.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-40.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-40.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-41.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-41.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-42.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-42.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-43.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-43.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-44	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-44.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-44.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-45.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-45.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-45A.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-45A.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-46.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-46.2	CONNECTOR	BUILDING 20 TANKS

RCRA-BB	20-46.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-46.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-46.5	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-47.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-47.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-48.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-48.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-49.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-49.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-50.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-50.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-51.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-51.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-52.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-52.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-53.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-53.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-54.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-54.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-55.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-55.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-56.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-56.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-57.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-57.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-58.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-58.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.5	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.6	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-59.7	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-60.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-60.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-61.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-61.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-61A	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-62.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-62.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-63.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-63.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-64.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-65.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-65.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-66.1	CONNECTOR	BUILDING 20 TANKS

RCRA-BB	20-66.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-66A	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-67.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-67.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-67A	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-70.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-70.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-71.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-71.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-72.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-72.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-72.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-72.4	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-72.5	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-72.6	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-73.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-73.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-74.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-74.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-75.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-75.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-75.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-75A.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-75A.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-75A.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-76.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-76.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-76.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-77.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	20-77.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	392.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	392.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	393.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	393.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	393.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	394.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	394.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	395.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	396.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	396.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	396.3	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	399.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	402.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	402.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	403.1	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	403.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	404.1	CONNECTOR	BUILDING 20 TANKS

RCRA-BB	404.2	CONNECTOR	BUILDING 20 TANKS
RCRA-BB	1442	VALVE	BUILDING 23
RCRA-BB	1443	VALVE	BUILDING 23
RCRA-BB	1444	VALVE	BUILDING 23
RCRA-BB	1444A	VALVE	BUILDING 23
RCRA-BB	1444B	VALVE	BUILDING 23
RCRA-BB	1444C	VALVE	BUILDING 23
RCRA-BB	1446	VALVE	BUILDING 23
RCRA-BB	1447	VALVE	BUILDING 23
RCRA-BB	1448	VALVE	BUILDING 23
RCRA-BB	1450	VALVE	BUILDING 23
RCRA-BB	1451	VALVE	BUILDING 23
RCRA-BB	1452	VALVE	BUILDING 23
RCRA-BB	1453	VALVE	BUILDING 23
RCRA-BB	1455	VALVE	BUILDING 23
RCRA-BB	1457	VALVE	BUILDING 23
RCRA-BB	1458	VALVE	BUILDING 23
RCRA-BB	1459	VALVE	BUILDING 23
RCRA-BB	1441	CONNECTOR	BUILDING 23
RCRA-BB	1441.1	CONNECTOR	BUILDING 23
RCRA-BB	1441.2	CONNECTOR	BUILDING 23
RCRA-BB	1442.1	CONNECTOR	BUILDING 23
RCRA-BB	1442.2	CONNECTOR	BUILDING 23
RCRA-BB	1442.3	CONNECTOR	BUILDING 23
RCRA-BB	1443.1	CONNECTOR	BUILDING 23
RCRA-BB	1444.1	CONNECTOR	BUILDING 23
RCRA-BB	1444.2	CONNECTOR	BUILDING 23
RCRA-BB	1444A.1	CONNECTOR	BUILDING 23
RCRA-BB	1444A.2	CONNECTOR	BUILDING 23
RCRA-BB	1444A.3	CONNECTOR	BUILDING 23
RCRA-BB	1444A.4	CONNECTOR	BUILDING 23
RCRA-BB	1444B.1	CONNECTOR	BUILDING 23
RCRA-BB	1444B.2	CONNECTOR	BUILDING 23
RCRA-BB	1444C.1	CONNECTOR	BUILDING 23
RCRA-BB	1445	CONNECTOR	BUILDING 23
RCRA-BB	1446.1	CONNECTOR	BUILDING 23
RCRA-BB	1446.2	CONNECTOR	BUILDING 23
RCRA-BB	1447.1	CONNECTOR	BUILDING 23
RCRA-BB	1447.2	CONNECTOR	BUILDING 23
RCRA-BB	1448.1	CONNECTOR	BUILDING 23
RCRA-BB	1448.2	CONNECTOR	BUILDING 23
RCRA-BB	1450.1	CONNECTOR	BUILDING 23
RCRA-BB	1450.2	CONNECTOR	BUILDING 23
RCRA-BB	1451.1	CONNECTOR	BUILDING 23
RCRA-BB	1451.2	CONNECTOR	BUILDING 23
RCRA-BB	1452.1	CONNECTOR	BUILDING 23
RCRA-BB	1452.2	CONNECTOR	BUILDING 23

RCRA-BB	1452.3	CONNECTOR	BUILDING 23
RCRA-BB	1453.1	CONNECTOR	BUILDING 23
RCRA-BB	1453.2	CONNECTOR	BUILDING 23
RCRA-BB	1453.3	CONNECTOR	BUILDING 23
RCRA-BB	1453.4	CONNECTOR	BUILDING 23
RCRA-BB	1454	CONNECTOR	BUILDING 23
RCRA-BB	1455.1	CONNECTOR	BUILDING 23
RCRA-BB	1455.2	CONNECTOR	BUILDING 23
RCRA-BB	1455.3	CONNECTOR	BUILDING 23
RCRA-BB	1457.1	CONNECTOR	BUILDING 23
RCRA-BB	1457.2	CONNECTOR	BUILDING 23
RCRA-BB	1458.1	CONNECTOR	BUILDING 23
RCRA-BB	1459.1	CONNECTOR	BUILDING 23
RCRA-BB	1459.2	CONNECTOR	BUILDING 23
RCRA-BB	1459.3	CONNECTOR	BUILDING 23
RCRA-BB	1327	VALVE	BUILDING 3
RCRA-BB	1335	VALVE	BUILDING 3
RCRA-BB	1338	VALVE	BUILDING 3
RCRA-BB	1339	VALVE	BUILDING 3
RCRA-BB	1348	VALVE	BUILDING 3
RCRA-BB	1349	VALVE	BUILDING 3
RCRA-BB	1350	VALVE	BUILDING 3
RCRA-BB	1351	VALVE	BUILDING 3
RCRA-BB	1363	VALVE	BUILDING 3
RCRA-BB	1365	VALVE	BUILDING 3
RCRA-BB	1365A	VALVE	BUILDING 3
RCRA-BB	1367	VALVE	BUILDING 3
RCRA-BB	1368	VALVE	BUILDING 3
RCRA-BB	1368A	VALVE	BUILDING 3
RCRA-BB	424	VALVE	BUILDING 3
RCRA-BB	544	VALVE	BUILDING 3
RCRA-BB	549	VALVE	BUILDING 3
RCRA-BB	550	VALVE	BUILDING 3
RCRA-BB	551	VALVE	BUILDING 3
RCRA-BB	551.3	OTHER	BUILDING 3
RCRA-BB	1301	CONNECTOR	BUILDING 3
RCRA-BB	1302	CONNECTOR	BUILDING 3
RCRA-BB	1303	CONNECTOR	BUILDING 3
RCRA-BB	1327.1	CONNECTOR	BUILDING 3
RCRA-BB	1327.2	CONNECTOR	BUILDING 3
RCRA-BB	1328	CONNECTOR	BUILDING 3
RCRA-BB	1329	CONNECTOR	BUILDING 3
RCRA-BB	1333	CONNECTOR	BUILDING 3
RCRA-BB	1334	CONNECTOR	BUILDING 3
RCRA-BB	1335.1	CONNECTOR	BUILDING 3
RCRA-BB	1335.2	CONNECTOR	BUILDING 3
RCRA-BB	1336	CONNECTOR	BUILDING 3

RCRA-BB	1337	CONNECTOR	BUILDING 3
RCRA-BB	1338.1	CONNECTOR	BUILDING 3
RCRA-BB	1338.2	CONNECTOR	BUILDING 3
RCRA-BB	1339.1	CONNECTOR	BUILDING 3
RCRA-BB	1339.2	CONNECTOR	BUILDING 3
RCRA-BB	1340	CONNECTOR	BUILDING 3
RCRA-BB	1347	CONNECTOR	BUILDING 3
RCRA-BB	1348.1	CONNECTOR	BUILDING 3
RCRA-BB	1348.2	CONNECTOR	BUILDING 3
RCRA-BB	1349.1	CONNECTOR	BUILDING 3
RCRA-BB	1349.2	CONNECTOR	BUILDING 3
RCRA-BB	1350.1	CONNECTOR	BUILDING 3
RCRA-BB	1350.2	CONNECTOR	BUILDING 3
RCRA-BB	1351.1	CONNECTOR	BUILDING 3
RCRA-BB	1351.2	CONNECTOR	BUILDING 3
RCRA-BB	1362	CONNECTOR	BUILDING 3
RCRA-BB	1363.1	CONNECTOR	BUILDING 3
RCRA-BB	1363.2	CONNECTOR	BUILDING 3
RCRA-BB	1364	CONNECTOR	BUILDING 3
RCRA-BB	1364.1	CONNECTOR	BUILDING 3
RCRA-BB	1365.1	CONNECTOR	BUILDING 3
RCRA-BB	1365.2	CONNECTOR	BUILDING 3
RCRA-BB	1365.3	CONNECTOR	BUILDING 3
RCRA-BB	1365.4	CONNECTOR	BUILDING 3
RCRA-BB	1365.5	CONNECTOR	BUILDING 3
RCRA-BB	1365A.1	CONNECTOR	BUILDING 3
RCRA-BB	1365A.2	CONNECTOR	BUILDING 3
RCRA-BB	1365A.3	CONNECTOR	BUILDING 3
RCRA-BB	1365A.4	CONNECTOR	BUILDING 3
RCRA-BB	1366	CONNECTOR	BUILDING 3
RCRA-BB	1367.1	CONNECTOR	BUILDING 3
RCRA-BB	1367.2	CONNECTOR	BUILDING 3
RCRA-BB	1367.3	CONNECTOR	BUILDING 3
RCRA-BB	1368.1	CONNECTOR	BUILDING 3
RCRA-BB	1368.2	CONNECTOR	BUILDING 3
RCRA-BB	1368A.1	CONNECTOR	BUILDING 3
RCRA-BB	1368A.2	CONNECTOR	BUILDING 3
RCRA-BB	1368A.3	CONNECTOR	BUILDING 3
RCRA-BB	1368A.4	CONNECTOR	BUILDING 3
RCRA-BB	1369	CONNECTOR	BUILDING 3
RCRA-BB	1369.1	CONNECTOR	BUILDING 3
RCRA-BB	1369A	CONNECTOR	BUILDING 3
RCRA-BB	410.1	CONNECTOR	BUILDING 3
RCRA-BB	411	CONNECTOR	BUILDING 3
RCRA-BB	424.1	CONNECTOR	BUILDING 3
RCRA-BB	424.2	CONNECTOR	BUILDING 3
RCRA-BB	544.1	CONNECTOR	BUILDING 3

RCRA-BB	544.2	CONNECTOR	BUILDING 3
RCRA-BB	545	CONNECTOR	BUILDING 3
RCRA-BB	545.1	CONNECTOR	BUILDING 3
RCRA-BB	546	CONNECTOR	BUILDING 3
RCRA-BB	546.1	CONNECTOR	BUILDING 3
RCRA-BB	547	CONNECTOR	BUILDING 3
RCRA-BB	547.1	CONNECTOR	BUILDING 3
RCRA-BB	548	CONNECTOR	BUILDING 3
RCRA-BB	548.1	CONNECTOR	BUILDING 3
RCRA-BB	549.1	CONNECTOR	BUILDING 3
RCRA-BB	549.2	CONNECTOR	BUILDING 3
RCRA-BB	550.1	CONNECTOR	BUILDING 3
RCRA-BB	550.2	CONNECTOR	BUILDING 3
RCRA-BB	550.3	CONNECTOR	BUILDING 3
RCRA-BB	550.4	CONNECTOR	BUILDING 3
RCRA-BB	551.1	CONNECTOR	BUILDING 3
RCRA-BB	551.2	CONNECTOR	BUILDING 3
RCRA-BB	551.4	CONNECTOR	BUILDING 3
RCRA-BB	551.6	CONNECTOR	BUILDING 3

Work Order:	423442	BLOWDOWN TANK - ANNUAL SAFETY PM			
Status Code:	INPRG	**Parent:**		**Sequence:**	**Failure:** FCC
Dates: Report	19-FEB-2014 10:42:27	**Required** 22-MAY-2014	**Scheduled**		**Start** 22-MAY-2014

Description:

Location:	**2301**	2301 AREA, BC31
Equipment:	**23-2-A-10**	BLOWDOWN TANK (FOR 2301 & 2302 BAYS) 102" O.D. X 65' HIGH CS
EQ Addr:	0023-04	**Serial Number:**
Print Nbr:	2302-A-10	**Model:**

Lead Craft	Requestor	Class	Type	Priority	Dept-Acct Job Nbr	MOC
OPER	PMSWO	S	PMPRD	4	108045-711013	

EQ USER1	SOL	**WO USER1**	
EQ USER2		**WO USER2**	

Operations	Labor Code	Description:	Assigned	Quantity	Planned Hours
10	OPER	Machine Operator		1	1.00

PM NBR APMS3514-01 **NEXT DATE** 21-MAY-2015 **USE TARGET** Y **FREQ** 52 WEEKS
Job Plan: APMS3514
BLOWDOWN TANK - ANNUAL SAFETY PM

Operations

10 **ANNUAL SAFETY PM**

INSPECT LEVEL IN SIGHTGLASS AND DRAIN CONTENTS.

LINE OPENING PERMIT? LO/TO PERMIT? N/S

4-22-14
Date Completed

D Cavanagh
Completed By

Supervisor

END OF WORKORDER

90% H_2O - PH 5

per T. HUBER

NOT A whole LOT OF MATERIAL in 2301 & 2302 Bays Blowdown TKS.

Work Order: 459257 BLOWDOWN TANK - ANNUAL SAFETY PM
Status Code: INPRG **Parent:** **Sequence:** **Failure:** FCC
Dates: Report 12-NOV-2015 16:08:34 **Required** 05-MAY-2016 **Scheduled** **Start** 05-MAY-2016
Description:

Location: 2301 2301 AREA, BC31
Equipment: 23-2-A-10 BLOWDOWN TANK (FOR 2301 & 2302 BAYS) 102" O.D. X 65' HIGH CS
EQ Addr: 0023-04 **Serial Number:**
Print Nbr: 2302-A-10 **Model:**

Lead Craft	Requestor	Class	Type	Priority	Dept-Acct Job Nbr	MOC
OPER	PMSWO	S	PMPRD	4	108045-711013	

EQ USER1 SOL **WO USER1**
EQ USER2 **WO USER2**

Operations	Labor Code	Description:	Assigned	Quantity	Planned Hours
10	OPER	Machine Operator		1	1.00

PM NBR APMS3514-01 **NEXT DATE** 04-MAY-2017 **USE TARGET** Y **FREQ** 52 WEEKS
Job Plan: APMS3514
BLOWDOWN TANK - ANNUAL SAFETY PM

Operations

10 **ANNUAL SAFETY PM**

INSPECT LEVEL IN SIGHTGLASS AND DRAIN CONTENTS. Drained 6 pails; Scrapped out.

LINE OPENING PERMIT? LO/TO PERMIT?

7-8-16
Date Completed

M. Dunitz / R Bostic
Completed By

Supervisor

END OF WORKORDER

From:	Matthew Belew
To:	Lutz, Craig
Cc:	Goodnight, Lorna; Scambiatterra, Graciela; Jeffery Sepesi; Rich Stutzki
Subject:	3M Cordova Response to EPA requests
Date:	Friday, March 23, 2018 12:52:30 PM

Craig,

On behalf of 3M Cordova the following statements are responses to the requests made following the inspection the week of March 5th:

1. You requested a copy of a tanker fill sheet for the tanker at the Building 18 90-day area. A fill sheet for this tanker could not be located. To the extent the fill sheet is required to demonstrate compliance with the less than 90-day storage requirement, please note that hazardous waste is never stored in these tankers for more than 72 hours before it is transferred for transport to an offsite treatment facility. Nonetheless, the facility has implemented a process and requirement to assure that fill sheets are completed and maintained.
2. You requested Subpart CC certification records for the four on-site tankers. We assume you are requesting documentation to demonstrate compliance with 40 CFR 265.1087(d)(1) – Container Level 2 Controls. We are requesting more time to respond to your request. We would like to get back to you by April 13th, 2018.

Thank you,
Matthew

3M Science. Applied to Life.™

Matthew Belew | Environmental Engineer
3M Cordova | Materials Resource Division
22614 Route 84 North | Cordova, IL 61242
Office: (309) 654-8072
mobelew@mmm.com | www.3M.com

Work Order: 486833 BUILDING #3 VENT AND BLOWDOWN TANKS
Status Code: INPRG Parent: Sequence: Failure: FCC
Dates: Report 24-FEB-2017 07:35:05 Required 27-MAR-2017 Scheduled Start 27-MAR-2017
Description: ATTACHMENT SPMS3513

Location: 000391 SAFETY ITEMS BLDG. 3
Equipment: 00300391 SAFETY ITEMS - BLDG #3 (MISC)
EQ Addr: 0003-00 Serial Number:
Print Nbr: 391 Model:

Lead Craft	Requestor	Class	Type	Priority	Dept-Acct Job Nbr	MOC
OPER	PMSWO	S	PMPRD	4	108045-711013	

EQ USER1 BLD WO USER1
EQ USER2 WO USER2

Operations	Labor Code	Description:	Assigned	Quantity	Planned Hours
10	OPER	Machine Operator		1	1.00

PM NBR SPMS3513-01 NEXT DATE 25-SEP-2017 USE TARGET Y FREQ 26 WEEKS
Job Plan: SPMS3513
BUILDING #3 VENT AND BLOWDOWN TANKS - SEMIANNUAL SAFETY PM

Operations

10 BUILDING #3 VENT AND BLOWDOWN TANKS

DATE: 6/6/13
SUPERCEDING DATE: 5/15/12
REASON FOR CHANGE: ADD STATEMENT REGARDING DRAINAGE

REFER TO SOP 1205

ALL BLOWDOWN AND VENT TANKS WILL BE DRAINED ONLY THROUGH THE INTER-FLOOR TRANSER LINES LOCATED ON THE ROOF.

CHECK AND DRAIN THE VENT AND BLOWDOWN TANKS ON THE ROOF OF BUILDING #3.

USE ATTACHMENT SPMS3513 DATED 3/29/00

LINE OPENING PERMIT? LO/TO PERMIT?

9-6-17
Date Completed

Completed By

Supervisor

SHIVELY

ATTACHMENT SPMS3513
3/29/00
Reviewed by: Richard Boelkins 3/31/00

BUILDING #3 ROOF VENT TANK & BLOWDOWN TANK INSPECTION

V-1 (VENT TANK 1) & B-1 (BLOWDOWN 1) STARTS IN A BAY GOING CLOCKWISE WITH V-15 & B-9 ENDING IN P BAY

Blowdown Tank	Liquid Level Less Than 8 Inches	Needs Cleaning	Vent Tank	Liquid Level Lower Than Overflow to Blowdown	All Vent Lines Clear	Needs Cleaning
B 1	OK X		V 1	X		
B 2	OK X		V 2	X		
B 3	OK		V 3	X		
B 4	OK		V 4	X		
B 5	NO	X	V 5			X
B 6	OK		V 6	X		
B 7	NO		V 7	X		
B 8	OK		V 8	X		
B 9			V 9	X		
			V 10	X		
			V 11	X		
			V 12	X		
			V 13	X		
			V 14	X		
			V 15	X		

Drained Lids Drained

Date Inspection Completed 9-6-07

Completed by:

Work Order: 497484 BUILDING #3 VENT AND BLOWDOWN TANKS
Status Code: INPRG Parent: Sequence: Failure: FCC
Dates: Report 17-AUG-2017 07:34:04 Required 25-SEP-2017 Scheduled Start 25-SEP-2017
Description: ATTACHMENT SPMS3513

Location: 000391 SAFETY ITEMS BLDG. 3
Equipment: 00300391 SAFETY ITEMS - BLDG #3 (MISC)
EQ Addr: 0003-00 Serial Number:
Print Nbr: 391 Model:

Lead Craft	Requestor	Class	Type	Priority	Dept-Acct Job Nbr	MOC
OPER	PMSWO	S	PMPRD	4	108045-711013	

EQ USER1 BLD WO USER1
EQ USER2 WO USER2

Operations	Labor Code	Description:	Assigned	Quantity	Planned Hours
10	OPER	Machine Operator		1	1.00

PM NBR SPMS3513-01 NEXT DATE 26-MAR-2018 USE TARGET Y FREQ 26 WEEKS
Job Plan: SPMS3513
BUILDING #3 VENT AND BLOWDOWN TANKS - SEMIANNUAL SAFETY PM

Operations

10 BUILDING #3 VENT AND BLOWDOWN TANKS

DATE: 6/6/13
SUPERCEDING DATE: 5/15/12
REASON FOR CHANGE: ADD STATEMENT REGARDING DRAINAGE

REFER TO SOP 1205

ALL BLOWDOWN AND VENT TANKS WILL BE DRAINED ONLY THROUGH THE INTER-FLOOR TRANSER LINES LOCATED ON THE ROOF.

CHECK AND DRAIN THE VENT AND BLOWDOWN TANKS ON THE ROOF OF BUILDING #3.

USE ATTACHMENT SPMS3513 DATED 3/29/00

INE OPENING PERMIT? LO/TO PERMIT?

2-23-18
Date Completed

Completed By

Joshua Bush
Supervisor

ATTACHMENT SPMS3513
3/29/00
Reviewed by: Richard Boelkins 3/31/00

BUILDING #3 ROOF VENT TANK & BLOWDOWN TANK INSPECTION

V-1 (VENT TANK 1) & B-1 (BLOWDOWN 1) STARTS IN A BAY GOING CLOCKWISE WITH V-15 & B-9 ENDING IN P BAY

Blowdown Tank	Liquid Level Less Than 8 Inches	Needs Cleaning	Vent Tank	Liquid Level Lower Than Overflow to Blowdown	All Vent Lines Clear	Needs Cleaning
B 1	✓		V 1	✓		
B 2	✓		V 2	✓		
B 3	✓		V 3	✓		
B 4		✓	V 4	✓		
B 5	✓		V 5		✓	Plugged
B 6	✓		V 6	✓		
B 7	✓		V 7	✓		
B 8	✓		V 8	✓		
B 9	✓		V 9	✓		
			V 10	✓		
			V 11	✓		
			V 12	✓		
			V 13	✓		
			V 14	✓		
			V 15	✓		✓ MDF 2-23-18

Date Inspection Completed 2-23-18

Completed by: ✓

3M Cordova - Vent Tank List for Buildings 3 and 23

Building	Vent Tank	Dwg #	Equip Product Basis - water and/or org. solvent
3	3-1-A-8	12-2465-2000-6 sht 8	Solvent & Water
3	3-10-A-4	12-2465-2023-8 sht 4	Solvent & Water
3	3-11-A-8	12-2465-2024-6 sht 9	Solvent & Water
3	3-12-A-9	12-2465-2028-7 sht 6	Solvent & Water
3	3-13-A-6	12-2465-2025-3 sht 8	Water
3	3-14-A-6	12-2465-2026-1 sht 7	Water
3	3-3-A-6	12-2465-2019-6 sht 7	Solvent
3	3-32-A-12	12-2465-2007-1 sht 10	Solvent & Water
3	3-4-A-12	12-2465-2002-2 sht 5	Solvent & Water
3	3-40-A-8A	12-2465-2027-9 sht 4	Solvent & Water
3	3-5-A-9	12-2465-2014-7 sht 11	Water
3	3-6-A-12	12-2465-2003-0 sht 9	Solvent
3	3-7-A-12	12-2465-2004-8 sht 8	Solvent & Water
3	3-8-A-5	12-2465-2005-5 sht 6	Solvent & Water
3	3-9-A-8	12-2465-2022-0 sht 9	Solvent
23	23-1-A-5	12-2771-2001-5 sht 6	Solvent & Water
23	23-3-A-11	12-2771-2002-3 sht 8	Solvent & Water
23	23-7-A-4	12-2771-2008-0 sht 6	Solvent & Water
23	23-6-A-4	12-2771-2012-2 sht 8	Solvent & Water
23	23-17-A-4	12-2771-2017-1 sht 6	Solvent
23	23-31-A-4	12-2771-2018-9 sht 5	Solvent
23	23-35-A-4	12-2771-2019-7 sht 1	Water
23	23-5-A-8	12-2771-2000-7 sht 13	Solvent

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: FEB Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	2-6-17		2-13-17		2-20-17		2-27-17			
Time:	0:70									
STORAGE AREA	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓				✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓				✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 90 days of the Acumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: MARCH **Year:** 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	0100		3-13		3-20		3-27			
Time:	3-6		0700		0700		0700			
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Acumulation Start Date indicated on the label	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays). If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: APRIL Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		TN		WJC			
Date:	4-3		4-10		4/17		4-24			
Time:	0700		0700		0800		0700			
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 90 days of the Acumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		TN		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: MAY Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC		WJC	
Date:	5-1		5-8		5-15		5-22		5-29	
Time:	0700		0700		0700		0700			
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓		✓	
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓		✓	
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓		✓	
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓		✓	
There is Good Housekeeping in the Area	✓		✓		✓		✓		✓	
There is No Evidence of Spills or Leaks	✓		✓		✓		✓		✓	
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓		✓	
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓		✓	
No Evidence of Leaks from Containers	✓		✓		✓		✓		✓	
Containers are Clean. No Waste on the Outside of the Container	✓		✓		✓		✓		✓	
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓		✓	
Labels are Complete, Visible, and Legible	✓		✓		✓		✓		✓	
The Accumulation Start Date is on the Label	✓		✓		✓		✓		✓	
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓		✓	
All stored containers are within 90 days of the Accumulation Start Date indicated on the label.	✓		✓		✓		✓		✓	
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓		✓	
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓		✓	
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓		✓	
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓		✓	
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓		✓	
Inspector Signature:	WJC		WJC		WJC		WJC		WJC	

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays). If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: JUNE Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	6-5		6-12		6-19		6-26			
Time:	0700		0700		0700		0700			
STORAGE AREA	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 FL from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓					
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Accumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: JULY **Year:** 2017

	Week 1	Week 2	Week 3	Week 4	Week 5
Inspector:	WJC	JN	WJC	WJC	WJC
Date:	07/03/17	7/10/2017	7/17/17	7/24/17	7/31/17
Time:	7-3-17	0800	0700		

STORAGE AREA	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail	Pass	Fail
Signs are Posted and Readable	✓		✓		✓		✓		✓	
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓		✓	
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓		✓	
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓		✓	
There is Good Housekeeping in the Area	✓		✓		✓		✓		✓	
There is No Evidence of Spills or Leaks	✓		✓		✓		✓		✓	
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓		✓	
CONTAINERS										
Containers in Good Condition. None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓		✓	
No Evidence of Leaks from Containers	✓		✓		✓		✓		✓	
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓		✓	
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓		✓	
Labels are Complete, Visible, and Legible	✓		✓		✓		✓		✓	
The Accumulation Start Date is on the Label	✓		✓		✓		✓		✓	
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓		✓	
All stored containers are within 60 days of the Accumulation Start Date indicated on the label	✓		✓		✓		✓		✓	
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓		✓	
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓		✓	
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓		✓	
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓		✓	
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓		✓	
Inspector Signature:	WJC	JN	WJC	WJC	WJC					

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays). If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: AUG Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJL		WJL		WJL		WJL			
Date:	8-7		8-14		8-21		8-29			
Time:	0700		0700		0700		0700			
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		—		✓					
No Evidence of Leaks from Containers	✓						✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Acumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJL		WJL		WJL		WJL			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays). If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: SEP **Year:** 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	0100		0100		0700		0900			
Time:	9-5		9-11		9-18		9-25			
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition. None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean. No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Acumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: Oct Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC				WJC		WJC	
Date:	10-2-17		10-10-17				10-23-17		10-30	
Time:	0700		0900						0700	
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓				✓		✓	
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓				✓		✓	
Wastes are Segregated From Non Waste Materials	✓		✓				✓		✓	
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓				✓		✓	
There is Good Housekeeping in the Area	✓		✓				✓		✓	
There is No Evidence of Spills or Leaks	✓		✓				✓		✓	
Flammable and Reactive Wastes are Greater Than 50 Ft from Property Line	✓		✓				✓		✓	
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓				✓		✓	
No Evidence of Leaks from Containers	✓		✓				✓		✓	
Containers are Clean: No Waste on the Outside of the Container	✓		✓				✓		✓	
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓				✓		✓	
Labels are Complete, Visible, and Legible	✓		✓				✓		✓	
The Accumulation Start Date is on the Label	✓		✓				✓		✓	
All Containers are Properly Closed and/or Sealed	✓		✓				✓		✓	
All stored containers are within 60 days of the Acumulation Start Date indicated on the label	✓		✓				✓		✓	
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓				✓		✓	
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓				✓		✓	
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓				✓		✓	
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓				✓		✓	
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓				✓		✓	
Inspector Signature:	WJC		WJC				WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: NOV Year: 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	11-6		11-13		11-21		11-27			
Time:	0700									
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Acumulation Start Date indicated on the label	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: DEC **Year:** 2017

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	12-4		12-11		12-18		12-26			
Time:	0900		0720		0720		0720			
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Acumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 18 Staging Area

Month: JAN **Year:** 2018

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC		WJC	
Date:	1-3-18		1-8-18		1-15-18		1-22-18		1-29-18	
Time:	0700		0700		0700		0700		0700	
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓		✓	
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓		✓	
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓		✓	
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓		✓	
There is Good Housekeeping in the Area	✓		✓		✓		✓		✓	
There is No Evidence of Spills or Leaks	✓		✓		✓		✓		✓	
Flammable and Reactive Wastes are Greater Than 50 Ft from Property Line	✓		✓		✓		✓		✓	
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓		✓	
No Evidence of Leaks from Containers	✓		✓		✓		✓		✓	
Containers are Clean: No Waste on the Outside of the Container	✓		✓		✓		✓		✓	
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓		✓	
Labels are Complete, Visible, and Legible	✓		✓		✓		✓		✓	
The Accumulation Start Date is on the Label	✓		✓		✓		✓		✓	
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓		✓	
All stored containers are within 60 days of the Acumulation Start Date indicated on the label	✓		✓		✓		✓		✓	
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓		✓	
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓		✓	
If Applicable, is the Outlet Valve for Rainwater Closed	✓		✓		✓		✓		✓	
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓		✓	
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓		✓	
Inspector Signature:	WJC		WJC		WJC		WJC		WJC	

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays).
If an issue arises, notify an environmental engineer.

WEEKLY HAZARDOUS WASTE INSPECTION FORM

Storage Area Inspected: ☐ Building 1 Lab ☐ Building 2 Scrap Room ☐ Outdoor Staging Area (Between Bldg 2 & 3) ☒ Bldg 16 Staging Area

Month: FEB **Year:** 2018

	Week 1		Week 2		Week 3		Week 4		Week 5	
Inspector:	WJC		WJC		WJC		WJC			
Date:	2-6		2-12		2-19		2-26			
Time:	0700		0700		0700					
STORAGE AREA	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**	**Pass**	**Fail**
Signs are Posted and Readable	✓		✓		✓		✓			
There is Adequate Aisle Space Between Rows of Containers - 3 Feet is Suggested	✓		✓		✓		✓			
Wastes are Segregated From Non Waste Materials	✓		✓		✓		✓			
Incompatible Wastes are Segregated or Separated by at Least 4 Feet in Every Direction	✓		✓		✓		✓			
There is Good Housekeeping in the Area	✓		✓		✓		✓			
There is No Evidence of Spills or Leaks	✓		✓		✓		✓			
Flammable and Reactive Wastes are Greater Than 50 Ft. from Property Line	✓		✓		✓		✓			
CONTAINERS										
Containers in Good Condition: None Damaged, Bulging, or Badly Rusted	✓		✓		✓		✓			
No Evidence of Leaks from Containers	✓		✓		✓		✓			
Containers are Clean. No Waste on the Outside of the Container	✓		✓		✓		✓			
All Required Labels are on the Containers - One on Top and One on the Side for 3M	✓		✓		✓		✓			
Labels are Complete, Visible, and Legible	✓		✓		✓		✓			
The Accumulation Start Date is on the Label	✓		✓		✓		✓			
All Containers are Properly Closed and/or Sealed	✓		✓		✓		✓			
All stored containers are within 60 days of the Accumulation Start Date indicated on the label.	✓		✓		✓		✓			
The Number of Containers in the Storage Area Does Not Exceed the Designed Capacity	✓		✓		✓		✓			
SECONDARY CONTAINMENT										
The Storage Area is Free of Cracks or Damage to the Impervious Coating	✓		✓		✓		✓			
If Applicable, is the Outlet Valve for Rainwater Closed	✓				✓		✓			
EMERGENCY RESPONSE EQUIPMENT										
All Spill Control Supplies and PPE Available and in Useable Condition	✓		✓		✓		✓			
Flammable Waste Storage Areas Have Fire Extinguishers and/or Sprinklers	✓		✓		✓		✓			
Inspector Signature:	WJC		WJC		WJC		WJC			

List the Corrective Actions Taken (Required for each "Fail") - Include the Name of the Person Responsible and the Date Completed

NOTE: Each hazardous waste storage area must have an inspection completed every 7 days (including weekends and holidays). If an issue arises, notify an environmental engineer.